City of Attleboro, Massachusetts

DEPARTMENT OF WASTEWATER
Government Center, 77 Park Street
Attleboro, Massachusetts 02703
Phone 774-203-1820♦Fax 508-761-9837

Paul A. Kennedy
Superintendent
Department of Wastewater

December 19, 2012

Discharge Monitoring Reports (OES4-SMR)
U.S. Environmental Protection Agency
5 Post Office Square Suite-100
Boston, MA 02109-3912

RE: Docket No. 10-013 Findings of Violation and Order for Compliance

Attention: David Turin

As required, enclosed is the report assessing the full scale nitrogen pilot plant during the previous year that is due on December 31, 2012.

If you have any questions, please contact me.

Sincerely,

Paul A. Kennedy
Superintendent of Wastewater

Cc: David Burns, DEP
Marie McDonald, EPA
Benjamin Levesque, CDM Smith

Memorandum

To: *Mr. Paul Kennedy, City of Attleboro Wastewater Superintendent*

From: *Benjamin Levesque, CDM Smith*

Date: *December 18, 2012*

Subject: *Summary of 2012 Pilot Plant Performance at the Attleboro WWTF*

As required by the Order of Compliance dated June 17, 2010, the following memorandum is provided as a summary of 2012 Pilot Plant Performance and operation at the Attleboro wastewater treatment facility (WWTF). The memorandum will present the following information:

- A brief background summary of the pilot plant program
- 2012 Pilot Plant performance related to achieving total phosphorus, total aluminum and total nitrogen effluent limits
- Modifications to improve pilot plant performance conducted throughout 2012
- Plan for 2013 Pilot Plant Operation

Background

The City of Attleboro received an updated National Pollution Discharge Elimination System (NPDES) permit (Permit No. MA 0100595) on June 8th, 2008 that required the WWTF to meet an effluent discharge for total nitrogen of 8 mg/L from May 1st through October 31st, as well as 0.1 mg/L total phosphorus (April thru October) and 122 ug/L total aluminum year round. The City's appeal was denied and effective as of October 1, 2009 the WWTF has been in violation of the total nitrogen levels in their NPDES Permit.

A Findings of Violation and Order For Compliance was executed by the Environmental Protection Agency (EPA) on 6/17/2010 requiring that by July 31, 2010 the City shall prepare and submit to EPA and the Massachusetts Department of Environmental Protection (MADEP) a Technical Memorandum describing the proposed modifications to the Attleboro WWTF. These modifications included changes to the WWTF's aeration basins (installation of submersible mixers for use in creating four anoxic tanks within the existing ten aeration basins at the facility), necessary control and electrical modifications to operate the mixers in order to achieve compliance with the total nitrogen limits contained in its NPDES Permit. The plant modifications were constructed and implemented by November 30, 2011 and the pilot plant was operational by May 2012 to correspond with the start of the 2012 nitrogen and phosphorus removal season.

2012 Pilot Plant Performance – Effluent Total Phosphorus

The attached Figure 1 shows the performance of the Attleboro WWTF at meeting the effluent total phosphorus limit of 0.1 mg/L. Utilizing dual point chemical addition of ferric chloride and polyaluminum chloride, as well as the existing sand filters, the Attleboro WWTF was able to achieve the required limit for most of the time period between April 1 and October 31, 2012.

There was one time period (August 2012) where the monthly average was 0.15 mg/L, which exceeded the 0.1 mg/L monthly limit. This occurred primarily because of results observed between August 13 and August 24, 2012. It is believed that these results of greater than 0.1 mg/L of effluent total phosphorus were the result of sewer cleaning/jetting that occurred as part of collection system maintenance during August. Once the cleaning was completed, effluent total phosphorus returned to below 0.1 mg/L monthly average. This is believed to be an isolated incident and not indicative of future issues that would impact achieving permit compliance.

2012 Pilot Plant Performance – Effluent Total Aluminum

The attached Figure 2 shows the performance of the Attleboro WWTF with regard to effluent total aluminum. The effluent limit is 122 ug/L of total aluminum and this limit was not exceeded at any point during 2012 to date. Particular attention was focused on the time period between April 1 and October 31, 2012 as that corresponds to the addition of polyaluminum chloride as part of the WWTF operation to remove total phosphorus and meet the 0.1 mg/L effluent limit. During other time periods throughout the year, there were no issues observed with meeting the total aluminum limit as there is no polyaluminum chloride addition at the facility at those times.

2012 Pilot Plant Performance – Effluent Total Nitrogen

The attached Figure 3 shows the performance of the Attleboro WWTF full scale pilot pilot plant operation as it relates to meeting a total nitrogen limit of 8 mg/L. As shown, there was limited success with consistently achieving the desired level of nitrogen removal utilizing the available aeration system configuration installed as part of the pilot plant to incorporate anoxic zones. Figure 4 shows the Attleboro WWTF influent ammonia concentrations and Figure 5 shows average daily plant flow between May 1st and October 31st, 2012.

Modifications to Improve Pilot Plant Performance

The following modifications to the pilot plant operation were initiated to improve performance during the permit time period:

- Adjustments to mechanical aerator speed to address issues related to high dissolved oxygen concentration in anoxic zones.
- Initiated step feed to aeration tanks to provide additional carbon for the anoxic processes.

The above operational modifications were not successful in lowering the effluent total nitrogen to less than 8 mg/L. It was noted during initial operation that influent concentrations of BOD to the Attleboro WWTF was lower than originally evaluated during the conceptual design of the aeration tank modifications. The availability of BOD (or lack thereof) can impact the denitrification process as it acts as a carbon source for the microorganisms that convert nitrate to nitrogen gas. It was also observed that a significant influent concentration of TKN was being discharged by one of the City's industrial dischargers, Metalor Technologies. The City began the process of both addressing the lack of carbon available for denitrification, as well as reviewing options for limiting nitrogen discharge from Metalor Technologies.

Metalor Technologies Interference

Metalor Technologies operates a silver powder and flake manufacturing facility in Attleboro. As part of the silver powder and flake manufacturing processes, significant amounts of ammonia are discharged from the facility. With regards to pounds of TKN discharged, Metalor Technologies represents 1/3rd of the nitrogen load received at the Attleboro WWTF. Figure 6 shows the concentration of ammonia and TKN discharged from Metalor Technologies between May 1st and October 31st 2012.

The City of Attleboro monitors Metalor Technologies discharges through their Industrial Pretreatment Program (IPP). Based on the amount of nitrogen discharged to the Attleboro wastewater collection system, the City worked throughout the year with Metalor as follows:

- Developed a City local limit related to TKN. This was reviewed with Metalor throughout the year and was approved by EPA on November 6, 2012 (see attached letter). This results in a allowable concentration discharge of 691 mg/L of TKN, which corresponds to a Allowable Industrial Loading (AIL) of 346 lb/d. It should be noted that Metalor Technologies is to receive 100% of the AIL for TKN through the City's IPP.

- With the approval of the local limit, Metalor Technologies is implementing a facility upgrade to provide effluent treatment to allow compliance with the local limits. The City has required that the upgrades be in place and operational by May 1, 2013 and that the City receive monthly progress reports related to the upgrade efforts. Correspondences with Metalor and EPA are attached to this memorandum.

- Prior to finalization of the local limitation, the City coordinated operational changes with Metalor in an effort to assess pilot plant performance. These efforts were coordinated to both review impacts of Metalor discharges to the overall Attleboro WWTF performance and look at performance of MicroC on nitrogen removal as part of the pilot plant effort. The first involved coordinating their discharge to be over a 24 hour period, to minimize "slug" discharges and increased nitrogen load to the plant during daytime business hours. The second was a shutdown of discharges from the facility for four days in July 2012 that

coincided with the trial testing of MicroC. The third involved a limitation of discharge from the previously approved 15 gpm to 4 gpm for a two week trial period in October 2012 to further review performance with MicroC addition (more information regarding these trials below). The selection of 4 gpm resulted in a TKN loading to the Attleboro WWTF representative of future loadings once Metalor Technologies implements their treatment improvements to comply with the approved local limits.

MicroC Modifications

Based on the initial pilot plant performance and the lower than anticipated influent BOD concentrations, it was recommended that supplemental carbon addition be evaluated to improve performance. CDM Smith and the City of Attleboro reached out to Environmental Operating Solutions (EOS) with regard to using their MicroC supplemental carbon product to improve nitrogen removal. Initial bench testing and review of available information showed the potential for MicroC to provide the necessary additional carbon for improved denitrification at the Attleboro WWTF. The following steps were taken to test and implement the use of MicroC at the Attleboro WWTF:

- A four day trial volume of MicroC 2000 was purchased from EOS in May of 2012. Because of the Metalor Technologies interferences described above and another issue with an IPP discharger, the pilot testing was conducted in July of 2012. While just a "snapshot" of performance, it was observed that effluent total nitrogen from the Attleboro WWTF was below 8 mg/L during this trial.

- The City of Attleboro executed a change order with the contractor (Waterline Industries) that installed the submersible mixers and other improvements associated with the pilot plant, to install a chemical storage tank (procured through the City of West Haven, CT), feed pumps and necessary piping to allow for a more permanent MicroC 2000 addition set-up. This work occurred during the month of August 2012.

- Once the new MicroC chemical feed system was installed and operational, a two week trial was conducted between October 14 and October 28, 2012 in coordination with limited discharge from Metalor Technologies. During this time, the effluent total nitrogen again was observed below the permit limit of 8 mg/L.

Plan for 2013 Pilot Plant Operation

The City of Attleboro will continue to monitor effluent total phosphorus, total aluminum and total nitrogen throughout the permitted time periods (May thru October for nitrogen, April thru October for phosphorus and annually for Aluminum) of 2013. With regard to effluent total phosphorus, the City will continue to add a combination of ferric chloride and polyaluminum chloride to optimize removal. This, in conjunction with continued operation of the effluent sand filters, should result in meeting the effluent monthly average concentration of 0.1 mg/L total phosphorus. Effluent total

aluminum will be monitored and appropriate operational changes will be implemented if needed for compliance with the 122 ug/L effluent limit.

The City of Attleboro is optimistic that the WWTF will be able to meet the 8 mg/L effluent limit required by their NPDES permit during the months of May thru October of 2013. Through the monitoring of discharge and the installation of an ammonia recovery system, the impacts associated with discharges from Metalor Technologies should be reduced. The use, monitoring and optimization of MicroC 2000 addition during 2013 will provide data necessary in determining the future performance of the Attleboro WWTF to meet an effluent total nitrogen limit of 8 mg/L. It is recommended for 2013 to maintain the currently enforced effluent total nitrogen interim limit of 33 mg/L

cc: David Polcari, CDM Smith

Figure 1
Effluent Total Phosphorus - April 1 thru October 31, 2012

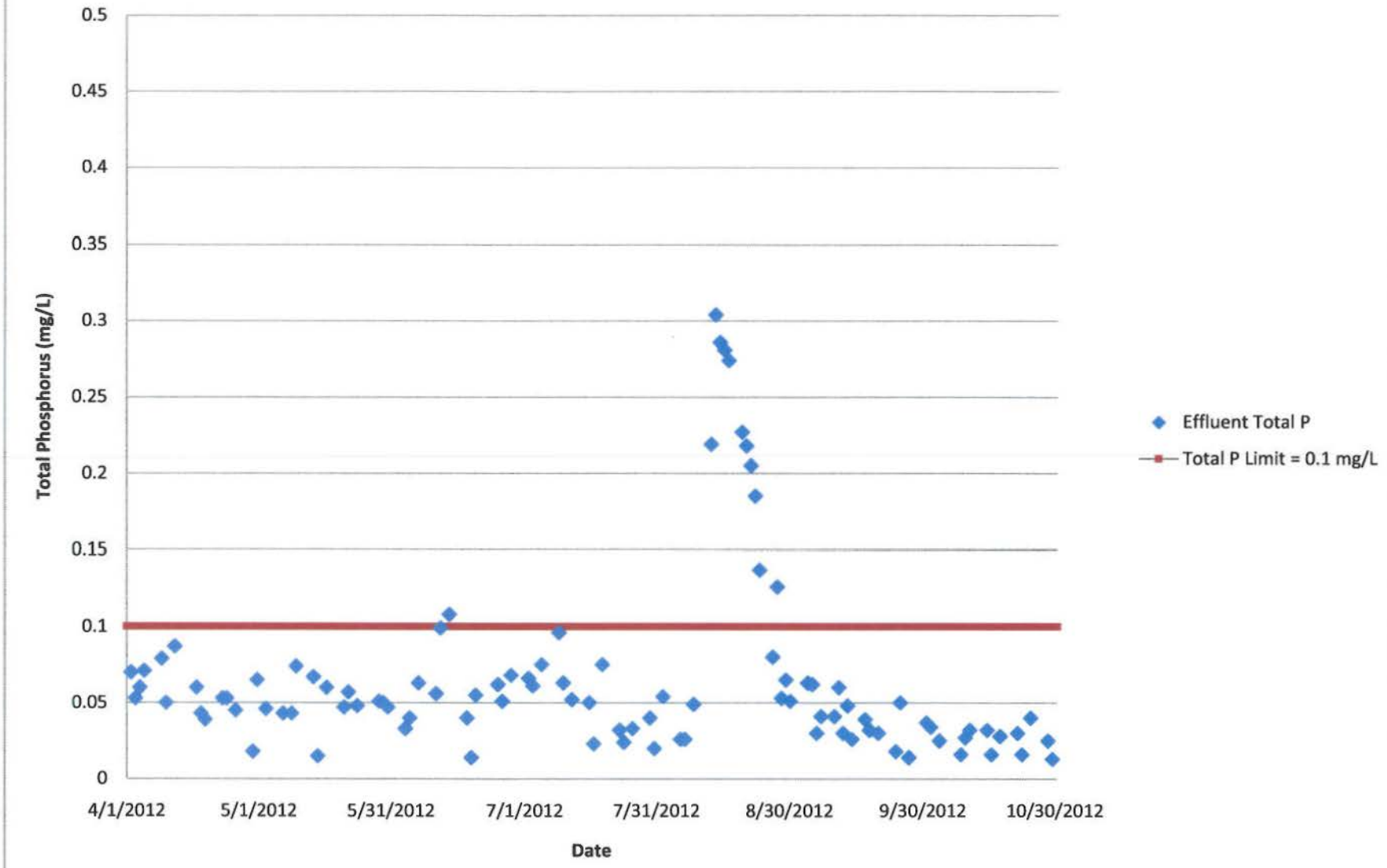


Figure 2
Effluent Total Aluminum - April 1 thru October 31, 2012

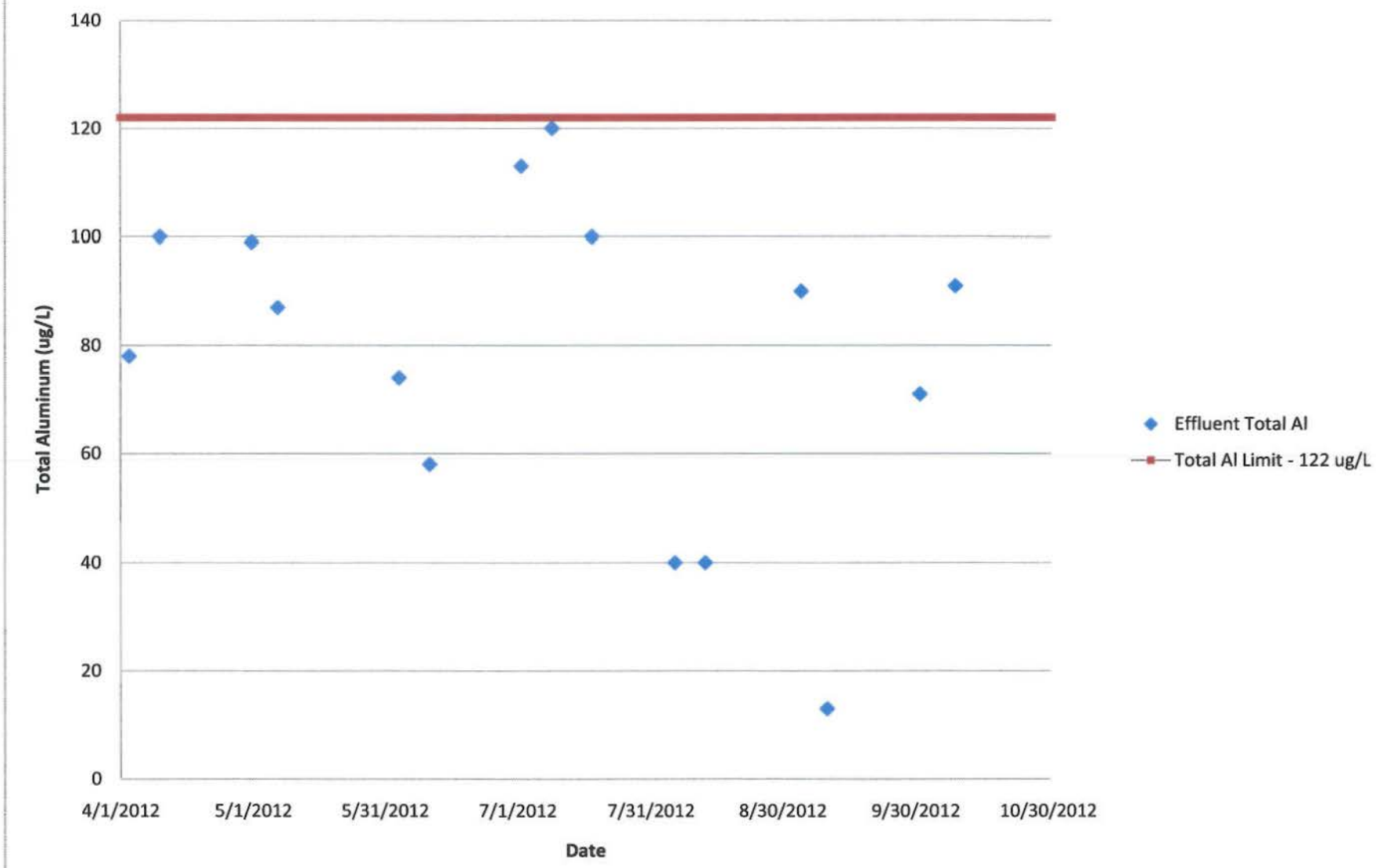


Figure 3
Effluent Total Nitrogen - May 1 thru October 31, 2012

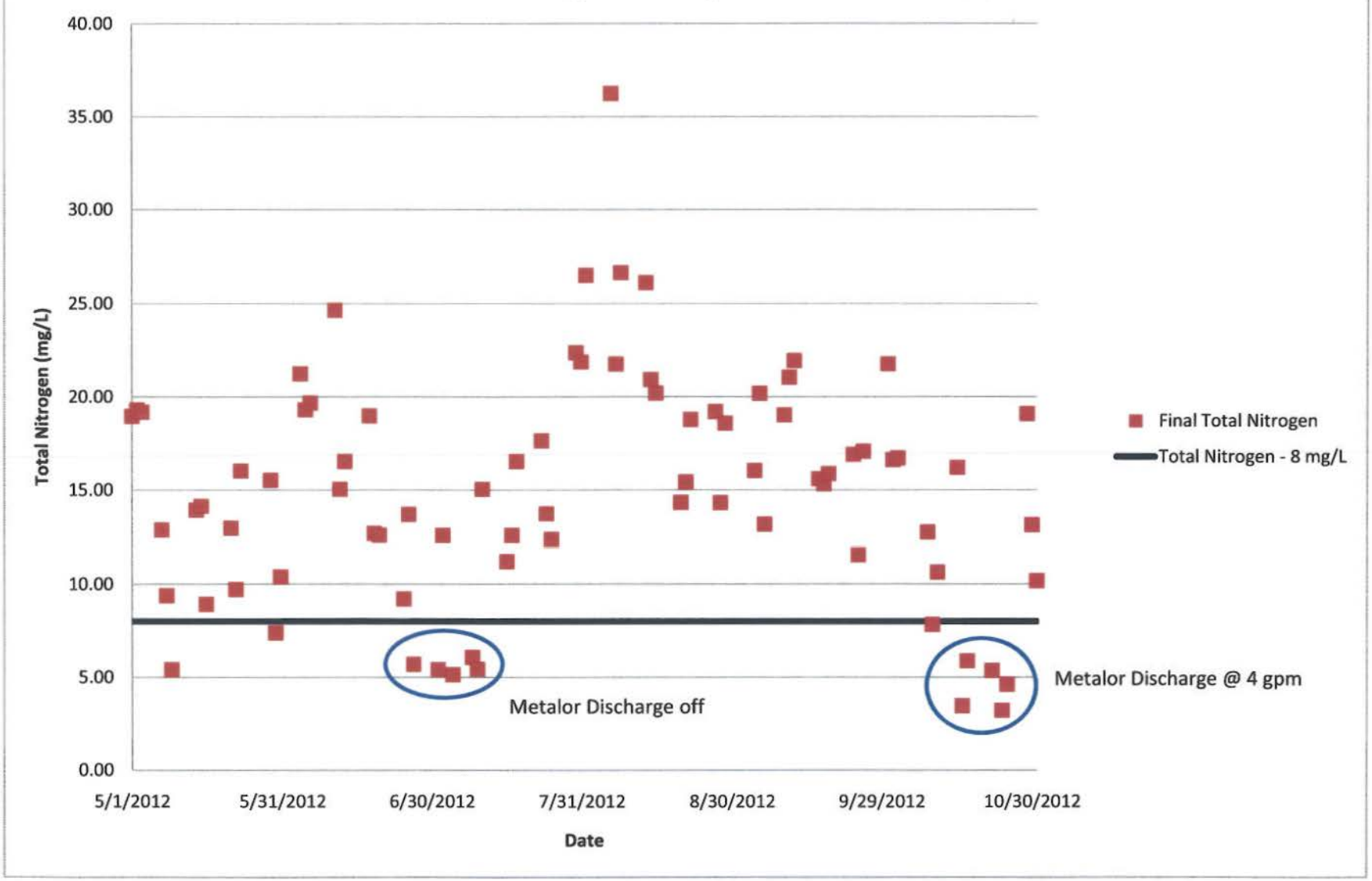


Figure 4
Influent Ammonia Concentration to Attleboro WWTF

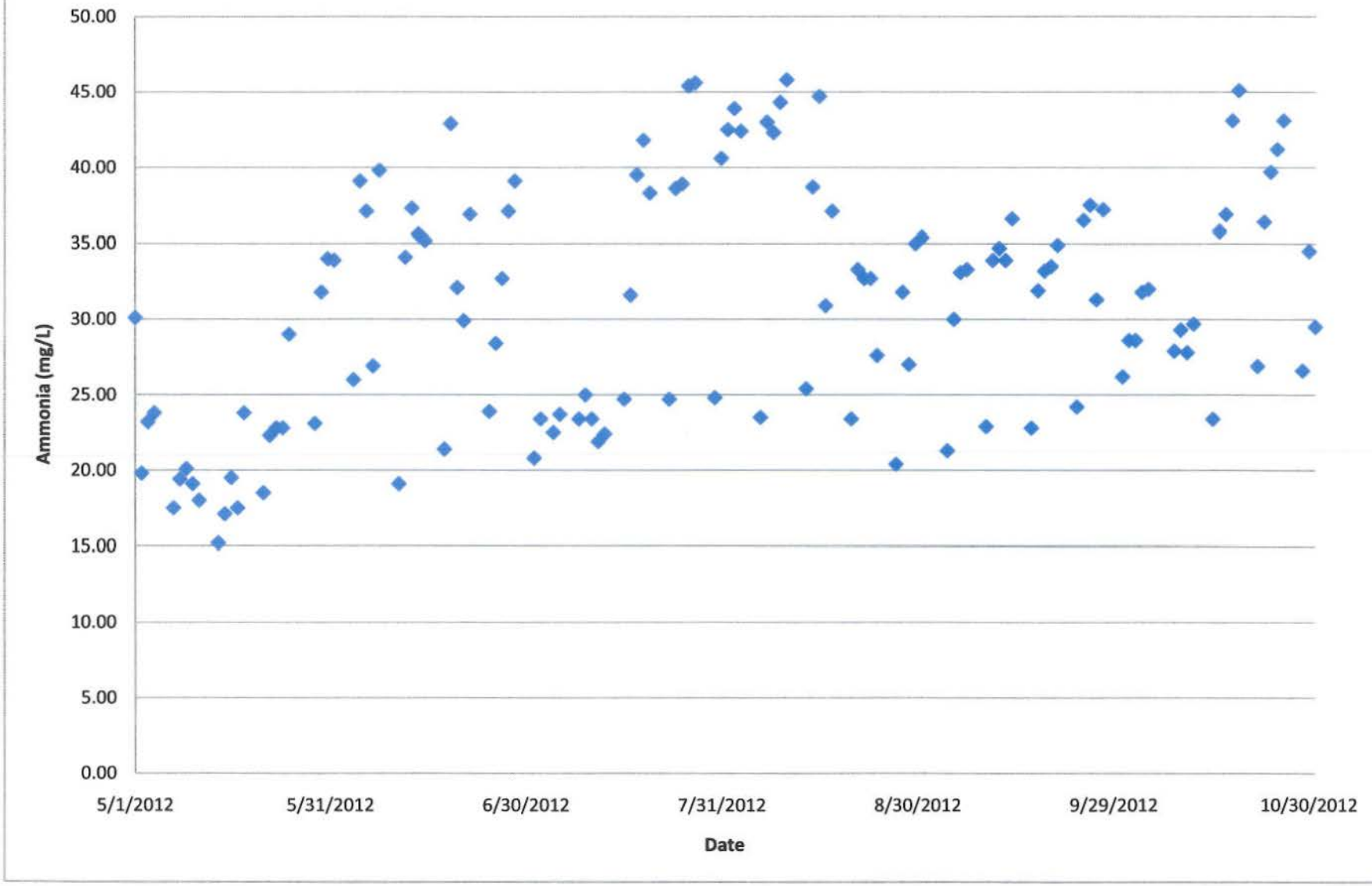


Figure 5
Attleboro WWTF Average Day Flow - May 1 thru October 31, 2012

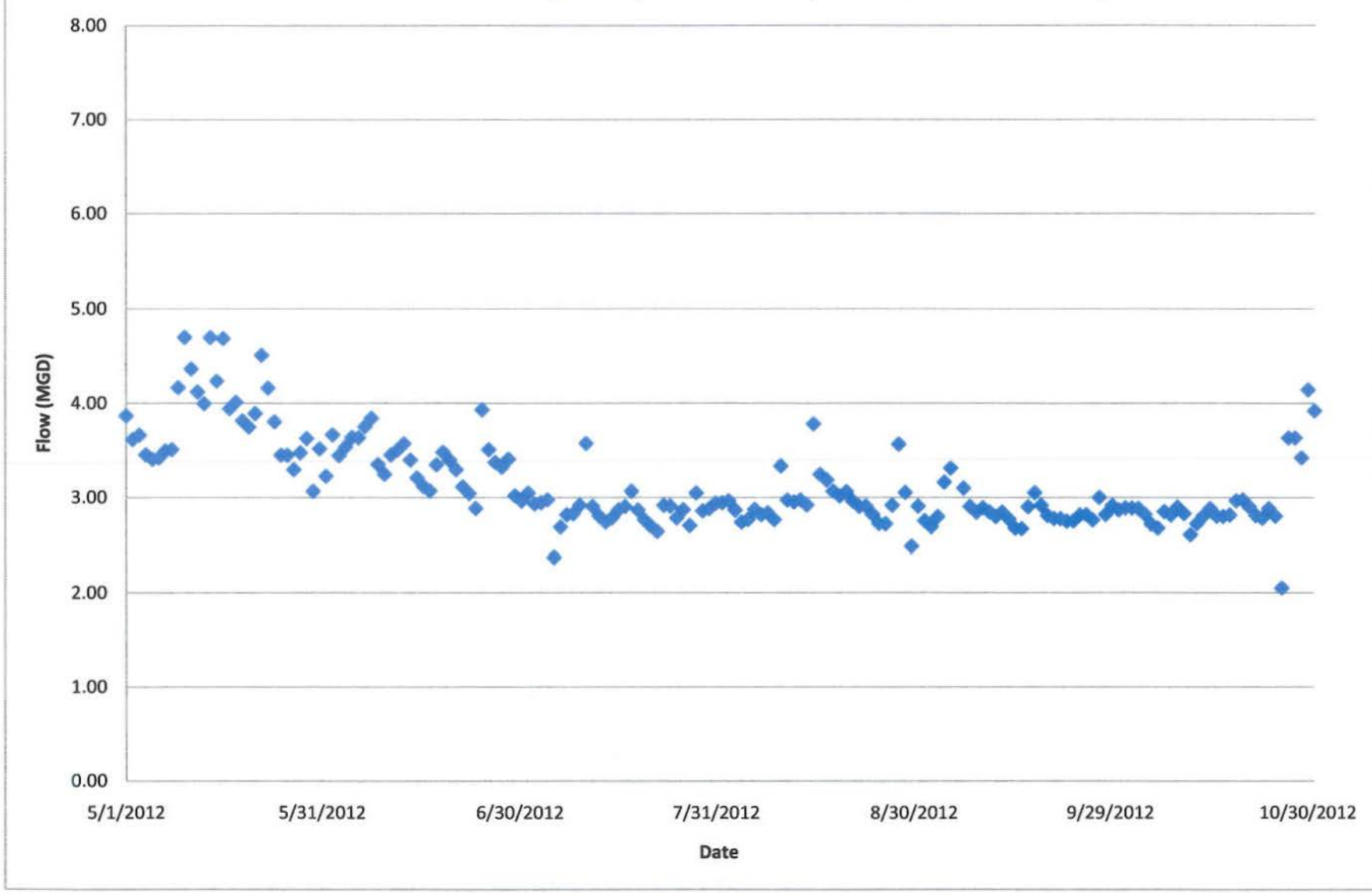
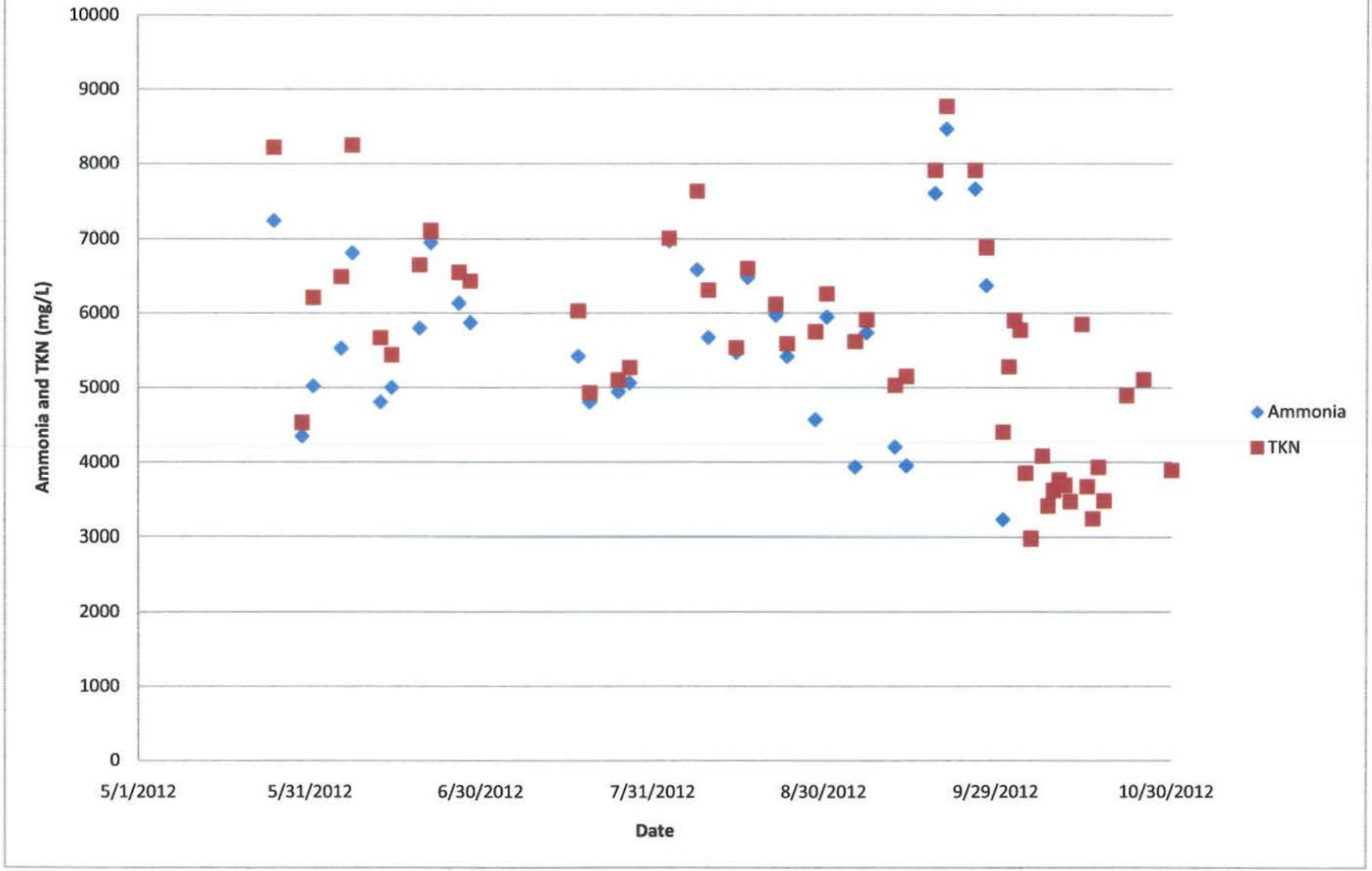


Figure 6
Metalor Technologies Ammonia and TKN Concentrations



City of Attleboro, Massachusetts

DEPARTMENT OF WASTEWATER
Government Center, 77 Park Street
Attleboro, Massachusetts 02703
Phone 774-203-1820 ♦ Fax 508-761-9837

Paul A. Kennedy
Superintendent
Department of Wastewater

July, 18, 2012

Metalor Technologies
52 Gardner Street
Attleboro, MA 02703

Subject: Treatment Options Status for Ammonia (TKN)

Attention: Ms. Diane George

As a result of your company's partial shutdown in July the following occurrences were observed at the City's wastewater treatment plant.

Before your company's shutdown, Attleboro's typical daily ammonia concentration entering our wastewater treatment plant ranged from the mid to high thirties (mg/l), however during Metalor's shutdown Attleboro's ammonia concentration entering the plant dropped to the low twenties, confirming our claim that Metalor's discharge is responsible for at least one third of the City's ammonia concentration that enters Attleboro's treatment plant. Once your company was in shutdown, savings at the treatment plant immediately became obvious in regard to power consumption and chemical usage. In essence, when your company is discharging to the sewer the City of Attleboro is spending more money to operate its wastewater treatment plant in order to treat your company's wastewater. In addition, there was a marked improvement with our treatment plant's ability to denitrify and comply with our NPDES limit for total nitrogen without the use of any additional carbon source chemicals. This was very encouraging and will have an enormous impact on our cost for chemicals, which should represent a substantial savings in our annual chemical budget.

In reference to your letter dated June 28, 2012, you mentioned that your company has met with four vendors to select the best treatment option to meet your company's needs. Also mentioned, one of those vendors has a rental unit that will hopefully become available in the near future.

In considering the adverse effects that your company's ammonia loading has on the City's wastewater treatment plant it would be very prudent for your company to expedite your selection process to get a treatment system in place as soon as possible, even if a rental unit is used on a temporary basis until a permanent system is installed. Within the next month Attleboro will once again be modifying its process to incorporate a very costly carbon source chemical to our process in order to meet our NPDES limit for total nitrogen. Your company's discharge will have a definite impact in regard to the amount of chemicals the City will have to use in their process along with the additional electrical costs associated.

Once the new chemical is introduced into our process your company's excessive discharge of Ammonia (TKN), will certainly have a costly impact on the way we operate our treatment plant, which will warrant the need for a substantial reduction in Metalor's discharge rate. Recent data collected at the Attleboro plant has shown Metalor's nitrite and nitrate discharge concentrations are virtually undetectable at our plant influent, however your TKN is a huge problem and your company's attention should be focused on lowering its TKN concentration. Please note that the City of Attleboro has already established a scientifically based local limit for TKN of 173 mg/l and is awaiting approval from the EPA. I must stress the fact that once the new limit goes into effect your company will be out of

compliance for that parameter and subject to enforcement. Please notify us as soon as possible to discuss your future treatment plans and a timeline for implementation.

If you have any questions, please contact me.

Sincerely,

Paul A. Kennedy
Superintendent of Wastewater

cc: Mayor Kevin J. Dumas, City of Attleboro
Mr. Barry LaCasse, City of Attleboro
Ms. Lisa Nelson, District Representative
Ms. Daneen Ferreira, MA House
Mr. Jeremy Denlea, Councilman, City of Attleboro
Mr. Thomas, City of Attleboro
Mr. Aaron Dumont, City of Attleboro
Mr. John Reed, City of Attleboro
Mr. Justin Pimpare, EPA
Mr. David Burns, DEP
Mr. Andrew Costa, Metalor
Mr. Marc Marcoccio, Metalor
Mr. Nathan Pawlowski, Metalor
Mr. John Bullock, Metalor
Mr. Howard Imhof, Metalor
Mr. Benjamin Levesque, CDM Smith

City of Attleboro, Massachusetts

DEPARTMENT OF WASTEWATER
Government Center, 77 Park Street
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Phone 774-203-1820◆Fax 508-761-9837

Paul A. Kennedy
Superintendent
Department of Wastewater

April 4, 2012

Purchasing Department
Carol Brown, Asst. Purchasing Agent
City of Attleboro
77 Park Street
Attleboro, MA 02703

Subject: Requested Proprietary Chemical Purchase
Nitrogen Pilot Plant

Dear Carol:

My explanation for requesting to purchase a proprietary chemical is as follows. First of all it should be understood that pilot plants are experimental projects that are allowed and then evaluated over a period of time to assess whether they can operate successfully. During the design phases of our Nitrogen Pilot Plant it was discussed that once it went into operation, if it didn't perform as expected we may be required to take additional steps to comply with our Order of Compliance issued by the Environmental Protection Agency. Our pilot plant has been in service for the past five months and after much trial and error it has been determined that our incoming wastewater has a carbon deficiency, which biologically inhibits the process from performing what it was designed to accomplish. This was determined by performing a laboratory bench test using an actual Attleboro wastewater sample which identified the deficiency, however it was suggested that the pilot plant can be successful with the use of an additional carbon source chemical called Micro-C. This chemical is a proprietary product having one manufacturer. There are other chemicals on the market that may be used, although not as affectively as Micro-C. In addition, the other alternative carbon sources would require costly investments requiring new buildings and feed equipment, and in some cases costly explosion proof equipment and containment areas. The capital cost for these alternatives could be in excess of one million dollars ($1,000,000). Therefore, I request that the proprietary chemical, Micro-C be our chemical of choice going forward.

If you need any further information, please don't hesitate to contact me.

Sincerely,

Paul A. Kennedy
Superintendent of Wastewater

Cc: Mayor Kevin J. Dumas
Barry LaCasse, Director of Budget & Administration
Deborah Gould, City Auditor
Benjamin Levesque, CDM Smith ✓

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 1
5 Post Office Square, Suite 100
BOSTON, MA 02109-3912

November 6, 2012

Paul Kennedy
Superintendent
City of Attleboro Department of Wastewater
77 Park Street
Attleboro, MA 02703

Re: Approval of Proposed Modifications for the City of Attleboro's Industrial Pretreatment Program

Dear Mr. Kennedy:

On October 5, 2012, the Environmental Protection Agency (EPA) placed on public notice its intent to approve the City of Attleboro's Proposed Modifications as part of its approved industrial pretreatment program. The purpose of the public notice was to provide interested parties an opportunity to comment on the Proposed Modifications as required by 40 C.F.R. § 403.18. As indicated in our letter dated October 2, 2012 to the City, the Proposed Modifications would be approved without further notice if no comments were received by our Agency.

The purpose of this letter is to notify the City that our office did not receive any comments on the original public notice. Given that, EPA is hereby approving the following Proposed Modifications:

Pollutant	Local Limitation (mg/l)	Allowable Industrial Loading (AIL) (lb/day)
BOD	600	------
COD	900	------
TKN	691*	346

*Metalor will receive 100% of the AIL for TKN

Rec'd 11

Please note that the Proposed Modifications are effective immediately and should be incorporated into the City's pretreatment program via the Rules and Regulations as soon as possible.

If you have any questions regarding this letter, please contact Justin Pimpare at (617) 918-1531.

Sincerely,

Mark Spinale, Manager
Municipal Assistance Unit

cc: Gregory Roy, CDM
Joesph Canzano, EPA
Aaron Dumont, City of Attleboro

City of Attleboro, Massachusetts
DEPARTMENT OF WASTEWATER
Government Center, 77 Park Street
Attleboro, Massachusetts 02703
Phone 774-203-1820 ♦ Fax 508-761-9837

Paul A. Kennedy
Superintendent
Department of Wastewater

November 7, 2012

Mr. Justin Pimpare
Regional Pretreatment Coordinator
EPA New England
5 Post Office Square
Suite 100 OEP 06-03
Boston, MA 02109

Subject: Metalor Technologies USA

Dear Mr. Pimpare:

Enclosed is a cover letter, along with a Compliance Order and the modified Industrial User Permit No. 026 issued to Metalor Technologies USA, which became effective November 6, 2012.

If you have any questions, please contact me.

Sincerely,

Paul A. Kennedy
Superintendent of Wastewater

Cc: Joseph Canzarno, EPA
David Turin, EPA
David Burns, DEP
Robert Greene, DEP
Kevin J. Dumas, Mayor City of Attleboro
Barry LaCasse, City of Attleboro
Aaron Dumont, City of Attleboro
John Reed, City of Attleboro
Thomas Hayes, City of Attleboro

City of Attleboro, Massachusetts

DEPARTMENT OF WASTEWATER
Government Center, 77 Park Street
Attleboro, Massachusetts 02703
Phone 774-203-1821 ♦ Fax 508-761-9837

Paul A. Kennedy
Superintendent of Wastewater
Department of Wastewater

November 7, 2012

Metalor Technologies USA
52 Gardner Street
Attleboro, MA 02703

Subject: Industrial Permit No.026

Attention: Mr. Andrew Costa

Enclosed is your company's modified Industrial User Discharge Permit No. 026. For some time now the Attleboro treatment plant has been dealing with very high concentrations of TKN (total kjeldahl nitrogen) from your facility. These concentrated discharges not only have increased our operating cost but most importantly do interfere with our nitrification/denitrification processes causing us to go out of compliance with our NPDES permit limit for total nitrogen.

Due to the fact that your company's concentrated discharge of TKN interferes with our treatment plant process causing us to go out of compliance the City must take the following actions to minimize this type of discharge to insure the continued compliance of the Attleboro Wastewater Treatment Plant.

The City of Attleboro's newly revised Local Limit for TKN is now 691 mg/l. In addition, your company's permitted Maximum Daily Discharge Flow Rate has been reduced from 60,000 gallons per day to 30,000 gallons per day. The enclosed limits for TKN and Maximum Daily Discharge Flow Rate are enforceable upon your receipt of this letter.

As in the past the City of Attleboro is willing to work with your company over the next several months with your endeavors to achieve compliance.

Sincerely,

Paul A. Kennedy
Superintendent of Wastewater

Cc: Justin Pimpare, EPA
Joseph Canzano, EPA
David Turin, EPA
David Burns, DEP
Robert Greene, DEP
Kevin J. Dumas, Mayor
Barry K. LaCasse, City of Attleboro
Aaron Dumont, City of Attleboro
John Reed, City of Attleboro
Thomas Hayes, City of Attleboro

A EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning the effective date and lasting through expiration, the permittee is authorized to discharge from outfall serial number 001 Pretreatment room final tank. (November 6-2011--December 31-2015) Equalized Flow.

Such discharges shall be limited and monitored by permittee as specified below:

Effluent Characteristic		Discharge Limitations specify units				Monitoring Requirement Frequency	Type
		Monthly Average	Weekly Average	Maximum Daily			
Flow				30,000	Gallons	Continuous	Metered 1.
PH	LL			5.5-9.5	s.u.	Continuous	Metered
Temperature	LL			104	o F	Continuous	Metered
Petroleum Oil & Grease	LL			15	Mg/L	4/Year Quarterly	Representative Grab 3.
TKN	LL			691	Mg/L	4/Year Quarterly	Representative Composite 3.
Aluminum	LL			1.3	Mg/L	4/ Year Quarterly	Representative Composite. 3.
Cadmium	LL			0.031	Mg/L	4/ Year Quarterly	Representative Composite. 3.
Chromium total	LL			1.71	Mg/L	4/ Year Quarterly	Representative Composite. 3.
Copper	LL			0.77	Mg/L	4/ Year Quarterly	Representative Composite. 3.
Iron		Report	Results		Mg/L	4/ Year Quarterly	Representative Composite. 3.
Lead	LL			0.052	Mg/L	4/ Year Quarterly	Representative Composite. 3.
Nickel	LL			1.8	Mg/L	4/ Year Quarterly	Representative Composite. 3.
Silver	LL			0.15	Mg/L	4/ Year Quarterly	Representative Composite. 3.
Zinc	LL			1.48	Mg/L	4/ Year Quarterly	Representative Composite. 3.
Cyanide	CS-AL			0.05	Mg/L	4/ Year Quarterly	Representative Grab 3.
TTO 624 & 625				2.13	Mg/L	1/ Year	Representative Grab 2.
Ammonia		Report	Results		Mg/L	4/ Year Quarterly	Representative Composite.
Suspended Solids (TSS)		Report	Results		Mg/L	4/ Year Quarterly	Representative Composite.

2. Samples to be taken by POTW personnel or in the presence of POTW personnel.
3. Unannounced sampling also conducted by the city twice per year.

CS: CATEGORICAL STANDARD
LL: LOCAL LIMIT
AL: ALTERNATIVE LIMIT COMBINED WASTE STREAM FORMULA

City of Attleboro, Massachusetts
DEPARTMENT OF WASTEWATER
Government Center, 77 Park Street
Attleboro, Massachusetts 02703
Phone 774-203-1820♦Fax 508-761-9837

COMPLIANCE ORDER
No. *12 - 1*

November 7, 2012

I. STATUTORY AUTHORITY

The following Findings are made and this ORDER is herein issued pursuant to the City of Attleboro Ordinance Section 16-21.1(4) Administrative Enforcement Remedies – Compliance Orders which grants the Superintendent of Wastewater the authority to issue orders directing that the user come into compliance with any provisions of Section 16–15 of said ordinance.

II. FINDINGS

This Order herein is based on the findings of violation of Section 16-15.8 Specific Prohibitions Sections a, c, j, n, t, u1, u2, u3, and u4, of the City of Attleboro Ordinances and the conditions of the modified Industrial User Permit No. 026. The order provides a compliance date of April 30, 2013, which the Superintendent has determined to be reasonable.

III. ORDER

This Compliance Order is issued by the City of Attleboro to Metalor Technologies USA located at 52 Gardner Street Attleboro, Massachusetts 02703 Industrial User Permit No. 026.

Accordingly, it is hereby ordered that:

1. By December 1, 2012, Metalor Technologies USA shall submit to the City of Attleboro an engineering report, which includes the following:

   a. A detailed summary of measures that will be implemented by Metalor Technologies USA to reduce the Concentration of TKN, being discharged from your facility.

   b. A detailed evaluation and explanation of the causes of the excessive TKN being discharged.

   c. Specific recommendations for interim and long-term corrective measures proposed to eliminate these violations of your modified industrial user permit, including a schedule for their implementation.

1V. NOTIFICATION PROCEDURES

1. Where this Order requires a specific action to be performed within a certain time frame, the Permittee shall submit a written notice of compliance or noncompliance by the last day of each month during the specified compliance time frame of April 30, 2013. The timely submission of a required report shall satisfy the requirement that a notice of compliance was received.

2. If noncompliance is reported, notification should include the following information:

   a. A description of the noncompliance;

b. A description of any actions taken or proposed by the Permittee to comply with the requirements;

c. A description of any factors that explain or mitigate the noncompliance; and

d. An approximate date by which the Permittee will perform the required action.

3. After a notification of noncompliance has been filed, compliance with the past requirement shall be reported by submitting any required documents or providing the Superintendent with a written report indicating that the required action has been achieved. Submissions required by this Order shall be in writing and should be mailed to the following address.

City of Attleboro
Wastewater Treatment Plant
77 Park Street
Attleboro, MA 02703

V. GENERAL PROVISIONS

1. This Order does not constitute a waiver or a modification of the terms and conditions of the Permit. The Permit remains in full force and effect. The City of Attleboro reserves the right to seek any and all remedies available under the City of Attleboro Ordinances Section 16-15.8. as amended, for any violation cited in this Order.

2. This Order shall become effective upon receipt by the Permittee.

11/7/2012
Date

Paul A. Kennedy
City of Attleboro
Superintendent of Wastewater

Cc: Justin Pimpare, EPA
Joseph Canzano, EPA
David Turin, EPA
Robert Greene, DEP
David Burns, DEP
Kevin J. Dumas, Mayor City of Attleboro
Barry LaCasse, City of Attleboro
Aaron Dumont, City of Attleboro
John Reed, City of Attleboro
Thomas Hayes, City of Attleboro

PARAMETER	CONCENTRATION	UNITS
TKN	691	mg/l